

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

IN RE:

Case No. 08-35653-KRH

CIRCUIT CITY STORES, INC., et al.

Chapter 11 (Jointly administered)

Debtors,

**MOTION FOR ADMISSION *PRO HAC VICE* PURSUANT TO
LOCAL BANKRUPTCY RULE 2090-1(E)(2) WENDY W. SMITH**

Paul K. Campsen (the “Movant”) hereby moves the United States Bankruptcy Court for the Eastern District of Virginia, Richmond Division (“Bankruptcy Court”), pursuant to Local Bankruptcy Rule 2090-1(E), for an order authorizing Wendy W. Smith (Bar No. 133887) (“Ms. Smith”), an attorney with the law firm of Binder & Malter, LLP, to appear *pro hac vice* before the Bankruptcy Court in the referenced bankruptcy cases (the “Bankruptcy Case”) to represent Google, Inc.. In support of the Motion, the Movant states as follows:

1. Movant is a member in good standing of the bar of the Supreme Court of the Commonwealth of Virginia and admitted to practice before the United States Bankruptcy Court for the Eastern District of Virginia.

2. Ms. Smith is a member in good standing of the bar of the State of California and is authorized to practice in the following courts:

Paul K. Campsen, Esq.
VSB No. 18133
Kaufman & Canoles, P.C.
150 West Main Street (23510)
Post Office Box 3037
Norfolk, VA 23514
Tele: (757) 624-3000
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Wendy W. Smith, Esq.
California Bar No. 133887
Binder & Malter, LLP
2775 Park Avenue
Santa Clara CA 95050
Tele: (408) 295-1700
Fax: (408) 295-1531

Co-Counsel for Google, Inc.

Courts to Which Fully Admitted	Date of Admission
Courts of the State of California	1988
United States Bankruptcy Court - Northern District of California	1988
United States Bankruptcy Court - Eastern District of California	1988

3. Movant requests that the Bankruptcy Court authorize Ms. Smith to file pleadings in, to appear and be heard at hearings concerning, and to otherwise participate in the Bankruptcy Case (and related proceedings) on behalf of Google, Inc.

4. Movant and his law firm shall serve as local counsel with Ms. Smith in the Bankruptcy Case (and related proceedings).


5. Notice of this Motion has been given to: (a) the Office of the United States Trustee; (b) counsel for the Debtors; and (c) all persons receiving electronic notice in the Bankruptcy Case of the date hereof.

6. Pursuant to Local Bankruptcy Rule 9013-1(G), and because there are no novel issues of law presented in this Motion, the Movant requests that the Bankruptcy Court waive the requirement that all motions be accompanied by a written memorandum of law.

7. No prior request for the relief sought herein has been made to Bankruptcy the Bankruptcy Court in these Bankruptcy Cases or to any other court.

WHEREFORE, Movant respectfully requests that the Bankruptcy Court enter an Order authorizing Wendy W. Smith to appear *pro hac vice* in the Bankruptcy Case (and related proceedings) in substantially the same form as Exhibit A attached hereto and grant such other and further relief as the Bankruptcy Court deems just and proper.

Dated: February 12, 2009


/s/ Paul K. Campsen

Paul K. Campsen
Kaufman & Canoles, P.C.
150 W. Main Street
Norfolk, VA 23514


/s/ Wendy W. Smith

Wendy W. Smith, Esq.
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Binder & Malter, LLP
2775 Park Avenue
Santa Clara CA 95050
Tele: (408) 295-1700

DECLARATION PURSUANT TO 28 U.S.C. §1746

I declare under penalty of perjury that the above statements are true and correct to the best of my knowledge and belief.

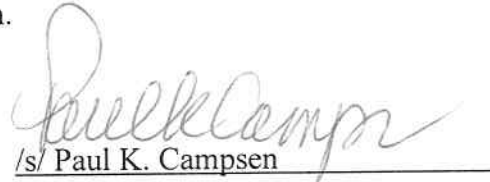
DATED: February 12, 2009


By: /s/ Paul K. Campsen
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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Entry of Appearance was sent on this 12th day of February, 2009, to all creditors and parties-in-interest who are included in the Bankruptcy Court's ECF e-mail notification system.


/s/ Paul K. Campsen

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